

---

---

UNITED STATES DISTRICT COURTSOUTHERN DISTRICT OF TEXAS

---

---

UNITED STATES OF AMERICA,

§

Plaintiff

§

versus

§

LEROY L. CLAIBORNE,

§

Defendant

§

CIVIL ACTION H-07-2264  
(Claim: C-117108)

## Complaint

1. *Jurisdiction.* The district court has jurisdiction because the United States is a party. *See U.S. CONST., art III, § 2, and 28 U.S.C. § 1345.*
2. *Venue.* The defendant is a resident of Harris County, Texas, and may be served with process at 10070 Westpark Dr. #1206, Houston, TX 77042.
3. *The Debt.* The debt owed the United States as of the date of the Certificate of Indebtedness is:

A.	Current principal	\$ 2,007.80
B.	Interest (capitalized and accrued)	\$ 477.98
C.	Administrative fees, costs, penalties (Including \$350.00 Filing fee)	\$ 356.71
D.	Attorney's fees	\$ 550.00
E.	Balance due	<u>\$ 3,392.49</u>
F.	Prejudgment interest accrues at 8.00% per annum being \$0.44 per day.	

The current principal in paragraph 3 A is after credits of \$870.29.

The certificate of indebtedness, attached as Exhibit A, shows the total owed excluding

attorney's fees and central intake facility charges. On the date of the certificate the principal and interest shown were correct after credits having been applied.

4. *Failure to pay.* Demand has been made on the defendant to pay the indebtedness, and

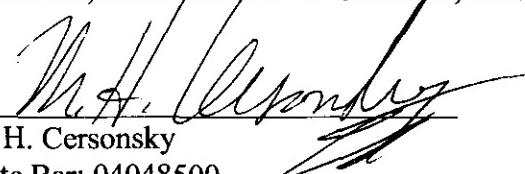
the defendant has failed to pay it.

5. *Prayer.* The United States prays for judgment for:

- A. The sums in paragraph 3 plus pre-judgment interest through the date of judgment, administrative costs, and post-judgment interest.
- B. Attorney's fees; and,
- C. Other relief the court deems proper.

Respectfully submitted,

ALONSO, CERSONSKY & GARCIA, P.C.

By: 

M. H. Cersonsky  
State Bar: 04048500  
Jim L. García  
State Bar: 07636700  
5065 Westheimer, Suite 600  
Houston, Texas 77056  
Telephone: (713) 840-1492  
Fax: (713) 840-0038

Attorneys for Plaintiff